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October 5, 2016

**VIA ECF and EMAIL:**

**sullivanysdchambers@nysd.uscourts.gov**

Honorable Richard J. Sullivan  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 2104  
New York, New York 10007

**Re: Andrews v. Al Jazeera Media Network, et al.**  
**Docket No. 16 CV 06414 (RJS)**

Dear Judge Sullivan,

We represent Plaintiff in the above-referenced action. Pursuant to Part 2(A) of Your Honor's Individual Rules and Practices, we write to respectfully request a pre-motion conference in connection with the appointment of a Special Process Server to serve Defendant Al Jazeera Media Network pursuant to Fed R. Civ. P. 4(f)(3).

One of the defendants in this case, Al Jazeera Media Network, is a corporation in the nation of Qatar. That nation is not a party to either international service of process treaty that America is a signatory to. *See generally The Inter-American Treaty on Letters Rogatory and The Convention of 15 November 1965 on the Service Abroad of Judicial and Extrajudicial Documents in Civil and Commercial Matters.*

The only way to perfect service formally in Qatar is through a process called letters rogatory. Requests made by letters rogatory go through the U.S. Department of State and require a fee of \$2,275, can take more than a year to accomplish service, and require the documents to be translated. The process is cumbersome and very expensive.

The Federal Rules of Civil Procedure provide a practical statutory method to perfect service. (*See Fed R. Civ. P. 4(f)(3)*, which states *service can be made in a foreign country "by other means not prohibited by international agreement."*)

The Plaintiff herein seeks to file a motion to respectfully request that this Court authorize the appointment of a special process server, to serve the documents in Qatar by

USPO International Mail pursuant to Fed. R. Civ. P. 4(F)(3). This method of process uses a new form of mail provided by the United States Post Office and also provides a proof of delivery to the person signing for the documents.

Similar cases have been filed in Federal Courts and in various State Courts, which follow the Federal Rules of Civil Procedure, and have appointed John Pierceall to serve defendants by this type of mail in foreign countries. *See attached Affidavit of John Pierceall.*

Plaintiff seeks to utilize the procedures contained in the Fed. R. Civ. P. 4(f)(3) to serve Defendant Al Jazeera Media Network by United States Postal Service International Mail and to file its proof of service attesting proper delivery of the package together with a receipt signed by the defendant through an authorized person.

Plaintiff seeks Your Honor's permission to file a motion seeking an Order appointing John Pierceall and agents of Ancillary Legal Corporation, each of whom is not an interested party or a party to the suit, and is a citizen of the United States and is over 18 years of age, to serve Al Jazeera Media Network in Qatar with process by United States Post Office International Mail, and to make a return on that service and attach thereto a receipt evidencing delivery to an authorized person.

Your time and attention to this matter are greatly appreciated.

Respectfully Submitted,

/s/  
Tahanie A. Aboushi, Esq.

Cc: **Via: ECF**  
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